

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LAURA BRALEY, on behalf of herself and all others
similarly situated,

Plaintiff,

v.

MASHNOON AHMED; CHRISTOPHER
ANGELES; BRANDECO, L.L.C. d/b/a
BrandNex.com; CASAD COMPANY d/b/a/ Totally
Promotional; CUSTOM WRISTBANDS INC. d/b/a
Kulayful Silicone Bracelets, Kulayful.com,
Speedywristbands.com, Promotionalbands.com,
Wristbandcreation.com, and 1inchbracelets.com;
AKIL KURJI; AZIM MAKANOJIYA; NETBRANDS
MEDIA CORP. d/b/a 24hourwristbands.com and
imprint.com; and ZAAPPAAZ, INC. d/b/a WB
Promotions, Inc., Wrist-Band.com, and
Customlanyard.net,

Defendants.

Civil Action No.: 4:17-cv-03064 (MH)

**STIPULATION EXTENDING DEFENDANTS' TIME TO ANSWER OR MOVE IN
RESPONSE TO PLAINTIFF'S COMPLAINT**

WHEREAS, plaintiff Laura Braley filed her complaint (the "Braley Complaint") in the
above-captioned action (the "Texas Action") on October 12, 2017;

WHEREAS, there are two other pending cases making similar allegations as the Texas
Action against overlapping defendants: *Kjessler v. Zaappaaz, Inc., et al.*, No. 17-1361 (D. Or.)
(the "Oregon Action"); and *Rueckert v. Zaappaaz, Inc., et al.*, No. 17-3607 (S.D. Tex.) (the
"Second Texas Action"); and

WHEREAS, plaintiff Laura Braley has moved before the Judicial Panel on Multidistrict
Litigation (the "JPML") to consolidate the Texas Action with the Oregon Action and any later-

filed actions asserting similar claims (any such actions, “Subsequent Actions”), which motion the JPML will consider on January 25, 2018;

NOW THEREFORE, in light of the prospects of consolidation of the Texas Action and other actions, and in the interests of avoiding unnecessary work for counsel and the Court, Plaintiff Braley agrees to grant all Defendants an extension of time to answer or move in response to the Braley Complaint in the Texas Action, and the Defendants agree to those terms, as follows:

1. Defendants shall receive an extension of time in which to answer or move in response to the Braley Complaint in the Texas Action; *provided, however*, that if any Defendant answers or moves in response to a complaint in the Oregon Action, Second Texas Action, or any Subsequent Action, that Defendant’s answer or motion in response to the Braley Complaint will be due on the same day.

2. On the date on which (A) a consolidated complaint is filed, or (B) the Braley Complaint or another complaint is declared as the operative complaint, Defendants will have thirty (30) days from that date in which to answer or move in response to the consolidated complaint or operative complaint.

Dated: January 9, 2018

Respectfully submitted,

/s/ David Isaak

/s/ Miranda Y. Jones

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Counsel for Defendant Casad Company

CERTIFICATE OF SERVICE

I certify that on this day I caused a true copy of the above document to be served upon the attorney of record for all parties via CM/ECF and paper copies will be sent to those indicated as non-registered participants.

Date: January 9, 2018

/s/ Miranda Y. Jones

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